

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

MARIA JARA, individually)	
and on behalf of a class of similarly situated)	
individuals,)	No. 19-cv-04532
)	
<i>Plaintiff,</i>)	
)	
v.)	Hon. Virginia M. Kendall
)	
REDBOX AUTOMATED RETAIL, LLC,)	Magistrate Judge Jeffrey Cummings
)	
<i>Defendant.</i>)	

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO DEFENDANT’S MOTION TO DISMISS**

Plaintiff Maria Jara (“Plaintiff”), through her undersigned attorneys, and pursuant to this Court’s Minute Entry of October 3, 2019 (Dkt. 22), hereby moves this Honorable Court for entry of an Order granting Plaintiff a fourteen (14) day extension of time to file her Memorandum of Law in Opposition to Defendant’s Motion to Dismiss. (Dkts. 19, 20.) In support of this Motion, Plaintiff states as follows:

1. On September 17, 2019, Plaintiff filed her First Amended Complaint alleging violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* (“TCPA”) by Redbox Automated Retail, LLC (“Defendant”). (Dkt. 17.)
2. On October 1, 2019, Defendant filed its Motion to Dismiss Plaintiff’s First Amended Complaint. (Dkts. 19, 20.)
3. On October 3, 2019, prior to the presentment hearing on Defendant’s Motion to Dismiss, the Court entered a minute order setting October 17, 2019 as Plaintiff’s deadline to file an opposition to Defendant’s Motion to Dismiss, and October 24, 2019 as the deadline for Defendant’s Reply brief in support of its motion to dismiss. (Dkt. 22.)

4. Plaintiff seeks a fourteen (14) day extension of time, until October 31, 2019, to file her opposition to Defendant's Motion to Dismiss, with Defendant's Reply brief in support of its Motion to Dismiss to be filed seven (7) days thereafter, on November 7, 2019. Plaintiff seeks this extension in good faith and in light of significant factual and legal issues raised by Defendant's Motion to Dismiss which will need to be addressed, as well as a number of prior commitments that Plaintiff is currently handling, including a motion for attorneys' fees that is due to be filed on October 14, 2019 in a preliminarily approved class action where notice has been sent out to putative class members, and an opposition to a motion to dismiss that is currently due on October 15, 2019 in the *Rohde v. ADP, LLC*, No. 19-cv-03347 (N.D. Ill.) matter.

5. This is Plaintiff's first request for an extension of time to respond to Defendant's Motion to Dismiss. Plaintiff has met and conferred with counsel for Defendant, and Defendant does not oppose Plaintiff's requested extension.

WHEREFORE, Plaintiff Maria Jara, respectfully requests that this Court enter an Order: granting Plaintiff an additional fourteen (14) days to file her Memorandum of Law in Opposition to Defendant's Motion to Dismiss, until October 31, 2019, with Defendant Redbox Automated Retail, LLC to file its Reply brief in support of its Motion to Dismiss on November 7, 2019.

Dated: October 8, 2019

Respectfully Submitted,

By: /s/Eugene Y. Turin

Eugene Y. Turin
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2019, I electronically filed the foregoing *Plaintiff's Unopposed Motion for Extension of Time to Respond to Defendant's Motion to Dismiss* with the Clerk of the Court using the CM/ECF system. A copy of said document will be electronically transmitted to all counsel of record.

Dated: October 8, 2019

By: /s/Eugene Y. Turin
Eugene Y. Turin